

I am an Extra class licensee (KBØHAE) and a VE with both the A.R.R.L. and W5YI organizations and these are my comments on the proposed elimination of the morse code testing requirement (element 1) in Amateur Radio license exams.

These comments apply to petitions RM-10781 through RM-10787 inclusive. However as this document is rather long I will only post it once.

First of all, many commenters seem to be saying that the elimination of morse code testing will eliminate the use of morse code as mode of communication on the Amateur bands. This is quite simply not true! As long as morse code is allowed as a valid operating mode, it will continue to be used by those who enjoy using it.

Another wrong assumption is that if the morse code testing requirement is removed, Amateur Radio will become a "radio wasteland like the 11m CB radio band" or that the "death of Amateur Radio" will automatically follow. Similar comments have been made about every single change in the Amateur licensing structure, but neither of these dire consequences has happened yet. I believe that as long as the FCC is interested in enforcement of the rules governing Amateur Radio, and as long the majority of Amateur Operators continue to be self policing and continue to care about keeping the HF (and VHF/UHF/EHF) Amateur allocations as clear of violators of the FCC rules (and violators of common on the air courtesy) as possible, no significant degradation of the Amateur Radio service will result.

Many commenters have stated that "anyone can learn morse code" or that morse code at 5wpm is "easily learned". . For some individuals this may be true, but not for everyone. There are many individuals (I know of several locally) that would like to upgrade from a Technician class license to General class or higher, but cannot because of minor hearing problems, or other learning problems. I was in favor of removing the morse code waiver, because it was being widely abused by those who could have learned morse code, but just did not want to. However, it DID eliminate a valid way for those who truly have serious problems learning morse code at all to upgrade from a Technician class license.

Learning morse code does not necessarily make an individual a better Amateur operator. It says nothing of the individual's education or character. Learning morse code in and of itself does not educate an Amateur operator in any proper operating procedure. It does not make them realize that courtesy to your fellow Amateur operators is very important. It does not make them any more likely to obey the FCC rules governing Amateur Radio. It does not mean that a person will be proficient in use of morse code, or that they will ever use it after getting their Amateur license. All it really shows is that the individual has put forth the effort to learn morse code. If, as some commenters suggest, morse code is easy to learn, then not much effort has been put forth. However I know several individuals who have put forth great effort, but have been unable to learn morse code. I feel that these individuals would be excellent Amateur HF operators, but the morse code is a barrier to them. Most individuals who know the original reason that a morse code proficiency test was included in testing for an Amateur Radio license would realize that reason no longer exists.

Some commenters want to retain morse code testing for an Amateur Radio license as a "filter"

to eliminate "undesirable individuals" from obtaining a General or Extra class license, or in other words to keep them from being able to operate on the HF bands as an Amateur operator. The element 1 test was never meant to be a "filter" or a "barrier". It does not function as a "filter", and never has. Anyone who has listened to the Amateur bands can attest to this. Other commenters seem to think that an Amateur can only take pride in earning their license if they pass element 1. This is not true. If Amateurs had to study and understand the FCC rules, and the technical and operating aspects of Amateur Radio instead of memorizing the test questions by rote, they could take pride in learning (and passing a test in) what for many are somewhat difficult subjects.

Many commenters who are not in favor of any changes in morse code testing for an Amateur Radio license have pointed out the availability of other services such as FRS, GRMS, and CB radio. However, one of the main attractions of Amateur Radio (for many individuals) is the ability to use the HF Amateur bands to communicate worldwide without the distance restrictions imposed (by both FCC rules, and frequency/propagation) on the above mentioned services.

While I am in favor of eliminating the morse code testing requirement for the Technician Plus and General class Amateur licensees, and giving current Technician class licensees the same HF privileges as Technician Plus licensees (as without the element 1 testing, the testing is the same for both), I am not in favor of removing the element 1 testing for the Extra class license, nor am I in favor of increasing the code speed of morse code testing for the Extra class license. I am NOT in favor of any changes to the CW sub-bands. I am also not in favor of "grand-fathering" Technician Plus operators to General class privileges. I feel that to have better Amateur operators, more study (or effort) must be required to pass the written exams. Further, I feel that to insure better educated Amateur operators, the following ABSOLUTELY MUST be done:

1-The question pools for Amateur Radio license testing should be immediately re-worded, or at least the order of correct answers changed. Then the updated question pools must be made available to CERTIFIED VEs ONLY! This would help to eliminate the rote memorization of test questions. Rote memorization of test questions is NOT the same as truly learning and UNDERSTANDING the FCC rules, and the technical and operating aspects of Amateur Radio.

2-In both test questions and study materials, much more emphasis needs to be placed on PROPER on-the-air operating procedures and COURTESY to other operators (especially during contests and DX pile-ups!) While some progress in this area has been made, more remains to be done. The FCC needs to encourage this in any and all ways possible.

3-While many Amateurs try to be helpful to newcomers to the service, far too many are overly critical of the new Amateurs honest mistakes. Negative attitudes and comments have driven many potentially excellent Amateur operators away from the service. We need to have a positive attitude towards new Amateurs, and be courteous and positive in helping them to understand proper on-the-air behavior.

Thank you for taking the time to review my comments.

Sincerely

Martin Campbell